

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

Case Number: 1:23-cv-04752 (Judge John F. Kness)

GS HOLISTIC, LLC,

Plaintiff,

v.

I & H TRADING, INC d/b/a
SMOKERS MART and TALAT
USMAN,

Defendants.

**THE PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST THE DEFENDANTS**

The Plaintiff, GS HOLISTIC, LLC, by and through its attorney, Ryan S. Fojo, makes this request for entry of a default judgment pursuant to Rule 55(b) against the Defendants, I & H TRADING, INC d/b/a SMOKERS MART and TALAT USMAN, and in support thereof states as follows:

1. The Plaintiff filed its Complaint against the Defendants on July 22, 2023 [DE 1].
2. On September 13, 2023, the Defendant I & H TRADING, INC d/b/a SMOKERS MART, was served with the Complaint and Summons [DE 10].
3. On September 7, 2023, the Defendant, TALAT USMAN, was served with the Complaint and Summons [DE 11].
4. On October 17, 2023, a clerk's default was entered against the Defendants, I & H TRADING, INC d/b/a SMOKERS MART and TALAT USMAN. *See* [DE 15].

4. The Plaintiff thus moves for entry of default judgment pursuant to Fed. R. Civ. P. 55(b).

5. In support of the motion, Plaintiff submit the following certifications:

Exhibit A: Affidavit of Attorney Ryan S. Fojo, as to docket review and costs expended.

Exhibit B: Affidavit of Christopher Folkerts, Chief Executive Officer of GS Holistic, LLC, as to statutory damages.

Exhibit C: judgment in GS Holistic, LLC. v. Envirocure, LLC. and Hassan Abid (22-cv-60463-BLOOM/Valle) for \$151,147.89 in statutory damages.

Exhibit D: judgment in GS Holistic, LLC. v. One Stop Vape et al (2:22-cv-04628-SVW-AGR) for \$225,000 in statutory damages and \$1,482 in costs.

Exhibit E: judgment in GS Holistic, LLC. v. Cali Smoke Depot LLC et al (2:22-cv-06679-SPG-KS) for \$150,000 in statutory damages and \$1,0999.86 in costs.

Exhibit F: judgment in GS Holistic, LLC. v. Bellair Cigarettes Inc et al One Stop Vape et al (2:22-cv-06363-GW-MRW) for \$150,000 in statutory damages and \$955.69 in costs.

Exhibit G: judgment in GS Holistic, LLC. v. Pyramids Wholesale et al (2:22-cv-04632-SPG-RAO) for \$300,000 in statutory damages and \$1,462 in costs.

Exhibit H: judgment in GS Holistic, LLC. v. Smoke Unlimited et al (1:22-cv-21254-FAM) for \$250,000 in statutory damages and \$563.41 in costs.

Exhibit I: judgment in GS Holistic, LLC. v. Abood Enterprise et al (1:22-

cv-06161) for \$150,000 in statutory damages and \$817 in costs.

Exhibit J: Pictures of infringing sale

Exhibit K: Trademark Registration Certificates

6. Plaintiff also submits and relies upon the Memorandum of Law in Support of Statutory Damages, in the amount of \$150,000.00.

WHEREFORE, the Plaintiff requests default judgment against I & H TRADING, INC d/b/a SMOKERS MART and TALAT USMAN, in the amount of \$150,000.00.

Respectfully submitted,

/s/ Ryan S. Fojo

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